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Counsel for Plaintiffs and the Proposed Classes

**UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 SAN FRANCISCO DIVISION**

J.L., C.B., K.S., P.M., N.G., R.F., J.D., and G.R.
 individually, and on behalf of all other similarly
 situated,

Plaintiffs,

v.

GOOGLE LLC,

Defendant.

CASE NO.: 3:23-cv-03440-AMO

CLASS ACTION

**JOINT STIPULATION TO FILE FIRST
 AMENDED COMPLAINT PURSUANT
 TO FED. R. CIV. P. 15(a)(2), TO EXTEND
 TIME TO FILE FIRST AMENDED
 COMPLAINT, AND TO CONTINUE
 CASE MANAGEMENT CONFERENCE**

COMPLAINT FILED: July 11, 2023

JOINT STIPULATION TO FILE FAC, TO EXTEND TIME TO FILE FAC, AND TO
 CONTINUE CASE MANAGEMENT CONFERENCE

Pursuant to Federal Rule of Civil Procedure 15(a)(2) and Civil Local Rules 6-2 and 7-12, Plaintiffs J.L., C.B., K.S., P.M., N.G., R.F., J.D., and G.R. (“**Plaintiffs**”) and Defendant Google LLC (“**Defendant**”) (collectively, “**Parties**”), by and through their respective counsel, hereby stipulate to Plaintiffs filing an amended complaint (“**FAC**”) on or before January 5, 2024 and to continuing the Case Management Conference and related deadlines, as follows:

RECITALS

1. WHEREAS, Plaintiffs filed the Class Action Complaint on July 11, 2023 (“**Complaint**”), asserting ten causes of action: (1) violation of California Unfair Competition Law, Bus. & Prof. Code § 17200 et seq.; (2) negligence; (3) invasion of privacy under California constitution; (4) intrusion upon seclusion; (5) larceny/receipt of stolen property; (6) conversion; (7) unjust enrichment; (8) direct copyright infringement; (9) vicarious copyright infringement; and (10) violation of Digital Millennium Copyright Act, 17 U.S.C. § 1202(b) (ECF 1);

2. WHEREAS, Defendant filed its motion to dismiss the Complaint on October 16, 2023 (ECF 20);

3. WHEREAS, after reviewing Defendant’s motion, Plaintiffs requested Defendant to stipulate to extend their deadline to amend the complaint, to which Defendant has agreed;

4. WHEREAS, Plaintiffs filed their notice of intent to file a first amended complaint in lieu of opposition to Defendant’s motion to dismiss on October 30, 2023 (ECF 25), and this stipulation follows;

5. WHEREAS, the Parties agree that it would be more efficient and orderly for the Case Management Conference to take place after the operative complaint has been filed and the Parties have had an opportunity to consider that complaint and meet and confer concerning a discovery and case management plan in light of that complaint;

STIPULATION

NOW, THEREFORE, the parties further stipulate and agree, subject to the approval of the Court, as follows:

i. Plaintiffs may file a FAC on or before January 5, 2024;

- 1 ii. The Initial Case Management Conference, currently scheduled for November
2 30, 2023 at 10 a.m., shall be continued to February 22, 2023 at 10 a.m.;
- 3 iii. the Parties' joint case management statement shall be filed by February 15,
4 2023; and
- 5 iv. the Parties shall make their Rule 26(a) initial disclosures by February 15, 2023.

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7 **IT IS SO STIPULATED.**

8 DATED: November 3, 2023

CLARKSON LAW FIRM, P.C.

9 /s/ Yana Hart

10 Ryan J. Clarkson, Esq.

11 Yana Hart, Esq.

12 Tracey Cowan, Esq.

13 *Attorneys for Plaintiffs and the Proposed Classes*

14 DATED: November 3, 2023

WILSON SONSINI GOODRICH & ROSATI

15 /s/ Eric P. Tuttle

16 Eric P. Tuttle, Esq.

17 *Attorneys for Defendant Google LLC*

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ATTESTATION UNDER LOCAL RULE 5-1(i)(3)

Pursuant to Civil Local Rule 5-1(i)(3), the undersigned filer hereby attests that all signatories listed, and on whose behalf the filing is submitted, concur in the filing's content and have authorized the filing.

DATED: November 3, 2023

CLARKSON LAW FIRM, P.C.

/s/ Yana Hart

Yana Hart, Esq.

[PROPOSED] ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED.

DATED: _____, 2023

HON. ARACELI MARTÍNEZ-OLGUÍN
UNITED STATES DISTRICT COURT JUDGE